

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SHARI AHRENDSEN, BARRY CLEMENT
and LISA BUSH, on behalf of the World
Travel, Inc. Employee Stock Ownership Plan,
and on behalf of a class of all other persons
similarly situated,

Plaintiffs,

v.

PRUDENT FIDUCIARY SERVICES, LLC, a
California Limited Liability Company,
MIGUEL PAREDES, JAMES A. WELLS,
JAMES R. WELLS, AND RICHARD G.
WELLS.

Defendants.

Case No. 2:21-cv-02157-HB

**DECLARATION OF LARS C. GOLUMBIC IN SUPPORT OF
DEFENDANTS PRUDENT FIDUCIARY SERVICES AND
MIGUEL PAREDES'S MOTION TO DISMISS
PLAINTIFFS' FIRST AMENDED COMPLAINT**

Pursuant to section 1746 of Title 28 of the United States Code, I, **LARS C.**

GOLUMBIC, declare the following:

1. I am over the age of 18, and I am otherwise fully competent to testify to the matters stated in this Declaration.
2. I am a Principal at Groom Law Group, Chartered in Washington, DC. I represent Defendants Prudent Fiduciary Services, LLC, and Miguel Paredes (the "Paredes Defendants") in the above captioned matter.
3. I make this Declaration in support of the Paredes Defendants' contemporaneously-filed Motion to Dismiss Plaintiffs' First Amended Complaint.
4. Attached as **Exhibit 1** is a true and correct copy of the Form 5500 for World Travel Inc., Employee Stock Ownership Plan for the plan year 2017.

5. Attached as **Exhibit 2** is an excerpt of a true and correct copy of the Engagement Agreement between World Travel, Inc., and Miguel Paredes, dated September 11, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 23, 2021

/s/ Lars C. Golumbic
Lars C. Golumbic